

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONOS, INC.,

Plaintiff,

v.

Google LLC,

Defendant.

§
§
§
§
§
§
§
§
§
§
§

NO. 6:20-cv-00881-ADA

**PLAINTIFF SONOS, INC.’S SUPPLEMENTAL PRELIMINARY
INFRINGEMENT CONTENTIONS AND IDENTIFICATION OF PRIORITY
DATES**

Plaintiff Sonos, Inc. (“Sonos” or “Plaintiff”) serves its supplemental preliminary infringement contentions (“Supplemental Contentions”) and identification of priority dates (“Supplemental Disclosure”) regarding infringement by Defendant Google LLC (“Google” or “Defendant”) of U.S. Patent No. 10,848,885 (“the ’885 Patent.”) Previously, on December 11, 2020, Sonos served its Preliminary Infringement Contentions. These Supplemental Contentions are intended to supplement those contentions.

Sonos bases this Disclosure on its current knowledge, understanding, and belief as to the facts and information available as of the date of this Disclosure. Sonos has not yet completed its investigation, collection of information, discovery, or analysis relating to this action, and additional discovery, including discovery from Google and third parties, may lead Sonos to amend, revise, and/or supplement this Supplemental Disclosure. Indeed, discovery in this action has only just begun, Google has not yet produced any documentation regarding the accused products, and Sonos has also not yet had the opportunity to inspect Google’s source code for the accused products. However, the accused functionalities of the accused products are implemented, at least in part, by Google’s proprietary and specialized electronics, firmware, and/or software, and the precise designs, processes, and algorithms used to perform the accused functionalities are held secret, at least in part, and are not publicly available in their entirety. As such, an analysis

of Google’s documentation and source code may be necessary to fully and accurately describe every infringing functionality.

For these reasons, Sonos specifically reserves the right to amend, revise and/or supplement this Supplemental Disclosure and/or accompanying exhibits in accordance with any Orders of record in this matter, and Federal Rule of Civil Procedure 26(e), as additional documents and information become available and as discovery and investigation proceed.

Sonos also reserves the right to supplement, modify or amend this Supplemental Disclosure to include additional products or services made, used, sold, or offered for sale in or imported into the United States by Google.

This Supplemental Disclosure is made without prejudice to any position Sonos may take with respect to claim construction. Sonos reserves its right to supplement this Supplemental Disclosure and exhibits based on the Court’s claim construction. Sonos further reserves the right to introduce and use such supplemental materials at trial.

The information in this Supplemental Disclosure is not an admission regarding the scope of any claims or the proper construction of those claims or any terms contained therein. The production of documents accompanying this Supplemental Disclosure is not an admission that such documents are admissible and Sonos does not waive any objections regarding admissibility. Sonos reserves the right to supplement its production of documents accompanying this disclosure upon identification or receipt of additional documents, including documents from third parties.

I. PRELIMINARY INFRINGEMENT CONTENTIONS

Sonos contends that the ’885 Patent is infringed, either individually or in combination, by the following products (individually or collectively, “Accused Product(s)”):

- Cast-enabled media players, including Chromecast, Chromecast Ultra, Chromecast Audio, Chromecast with Google TV, Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Audio, and Nest Wifi Point media players.

Sonos’s Supplemental Contentions are attached hereto as Exhibit A. At this stage, Sonos provides charts for the following claims:

- '885 Patent: claims 1-3, 5-10, 12-17, and 19-20 (Exhibit A)

A. Direct Infringement Under 35 U.S.C § 271(a)

'885 Patent: As set forth in Exhibit A, each Cast-enabled media player infringes every asserted claim of the '885 Patent. Thus, Google has directly infringed and continues to directly infringe each asserted claim of the '885 Patent at least by offering to sell, selling, and/or importing into the United States, Cast-enabled media players.

Further, on information and belief, Google has directly infringed and continues to directly infringe each asserted claim of the '885 Patent by virtue of installing firmware updates onto Cast-enabled media players, which constitutes “mak[ing]” an infringing device under 35 U.S.C § 271(a).

Further yet, on information and belief, Google has directly infringed and continues to directly infringe each asserted claim of the '885 Patent by virtue of Cast-enabled media players installed with firmware, which constitutes “us[ing]” an infringing device under 35 U.S.C § 271(a).

B. Induced Infringement Under 35 U.S.C § 271(b)

Pursuant to 35 U.S.C. § 271(b), Google also actively, knowingly, and intentionally induced (and continues to actively, knowingly, and intentionally induce) others to make, use, offer to sell, sell, and/or import the Accused Products into the United States. As noted in Sonos’s Amended Complaint, Google had actual knowledge of the Asserted Patents prior to the filing of the Amended Complaint.

'885 Patent: As set forth in Exhibit A, each Cast-enabled media player infringes every asserted claim of the '885 Patent. Despite knowing of the '885 Patent, Google has actively, knowingly, and intentionally induced (and continues to actively, knowingly, and intentionally induce) others to directly infringe the asserted claims by actively encouraging others to make, use, offer to sell, sell, and/or import Cast-enabled media players into the United States in violation of 35 U.S.C. § 271(b).

For example, through Google’s website, advertising and promotional material, user guides, the Google Home app (among other apps offered by Google), and/or the Google Play Store, Google has actively, knowingly, and intentionally encouraged and induced (and continues to actively, knowingly, and intentionally encourage and induce) others to install firmware updates onto Cast-enabled media players, and thereby “make[]” an infringing device, which constitutes direct infringement of the asserted claims of the ’885 Patent under 35 U.S.C § 271(a).

As another example, through Google’s website, advertising and promotional material, user guides, the Google Home app (among other apps offered by Google), and/or the Google Play Store, Google has actively, knowingly, and intentionally encouraged and induced (and continues to actively, knowingly, and intentionally encourage and induce) others to “use” Cast-enabled media players, which constitutes direct infringement of the asserted claims of the ’885 Patent under 35 U.S.C § 271(a).

As yet another example, Google has actively, knowingly, and intentionally induced (and continues to actively, knowingly, and intentionally induce) distributors and retailers to “offer[] to sell” and “sell[]” Cast-enabled media players, which constitutes direct infringement of the asserted claims of the ’885 Patent under 35 U.S.C § 271(a).

Along with its actual knowledge of the ’885 Patent, Google also knew (or should have known) that its actions would induce others to directly infringe the asserted claims of the ’885 Patent. For instance, Google has supplied and continues to supply Cast-enabled media players (as well as firmware updates) to users while knowing that the use of Cast-enabled media players will infringe the asserted claims of the ’885 Patent.

B. Contributory Infringement Under 35 U.S.C § 271(c)

Pursuant to 35 U.S.C § 271(c), Google has also contributorily infringed (and continues to contributorily infringe) the asserted claims of the Asserted Patents by supplying software components in the United States to be installed and/or used by users of the Accused Products – each of which is a material component of the Accused Products that has no substantial noninfringing use – with knowledge that the software components were especially made or

adapted for use in an Accused Product such that the installation and/or use of the software components would result in direct infringement. As noted in Sonos's Amended Complaint, Google had actual knowledge of the '885 Patent prior to the filing of the Amended Complaint.

'885 Patent: Google has contributorily infringed (and continues to contributorily infringe) the asserted claims of the '885 Patent by virtue of the fact that, in addition to importing and selling Cast-enabled media players that come pre-installed with firmware, Google supplies firmware updates for Cast-enabled media players in the United States, and each time a user installs such a firmware update, the user "makes" an infringing device and thereby directly infringes the asserted claims of the '885 Patent under 35 U.S.C. § 271(a). The software components included in the firmware updates are material components of Cast-enabled media players that are not staple articles or commodities of commerce suitable for substantial noninfringing use because the only possible use for these software components is to be installed and run on Cast-enabled media players.

Along with its actual knowledge of the '885 Patent, Google knew (or should have known) that the software components included in the firmware updates were especially made or adapted for installation on Cast-enabled media players, and that installation of these software components by others resulted in (and continues to result in) direct infringement of the '885 Patent under 35 U.S.C. § 271(a) because each such installation "makes" an updated player that meets every element of every asserted claims.

Moreover, as a result of Google's contributory conduct, others have directly infringed the asserted claims of the '885 Patent. For example, users have installed the supplied firmware updates onto Cast-enabled media players in the United States, thereby "making" updated Cast-enabled media players, which constitutes direct infringement. As another example, after installing the firmware updates onto Cast-enabled media players, users have used Cast-enabled media players, which also constitutes direct infringement of the asserted claims.

II. IDENTIFICATION OF THE PRIORITY DATE FOR EACH CLAIM OF THE ASSERTED PATENTS

Sonos sets forth that the priority date for each asserted claim is at least as early as:

- '885 Patent (claims 1-3, 5-10, 12-17, and 19-20): September 12, 2006

III. DOCUMENT PRODUCTION

Accompanying this Disclosure, Sonos produces, *inter alia*, copies of the file history for each Asserted Patent. The foregoing documents are included in the Bates range SONOS-SVG2-_____ - SONOS-SVG2-_____.

Dated: January __, 2020.

Respectfully submitted,

By _____
/s/ Jeffrey L. Johnson

Jeffrey L. Johnson
Texas Bar No. 24029638
ORRICK, HERRINGTON & SUTCLIFFE LLP
609 Main Street, 40th Floor
Houston, TX 77002
Telephone: 713.658.6400
Facsimile: 713.658.6401
jj@orrick.com

Clement Seth Roberts
California Bar No. 209203
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 Howard St.
San Francisco, CA 94105
Telephone: 415.773.5484
Facsimile: 415.773.5759
croberts@orrick.com

Bas de Blank
California Bar No. 191487
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Blvd.
Menlo Park, CA 94205
Telephone: 650.614.7343
Facsimile: 650.614.7401

bdeblank@orrick.com

Alyssa Caridis
California Bar No. 260103
ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa St., Suite 3200
Los Angeles, CA 90017
Telephone: 213.612.2372
Facsimile: 213.612.2499
acaridis@orrick.com

George I. Lee
Illinois Bar No. 6225430
Sean M. Sullivan
Illinois Bar No. 6230605
Rory P. Shea
Illinois Bar No. 6290745
J. Dan Smith
Illinois Bar No. 6300912
LEE SULLIVAN SHEA & SMITH LLP
656 W. Randolph St., Floor 5W
Chicago, IL 60661
Telephone: 312.754.9602
Facsimile: 312.754.9603
lee@ls3ip.com
sullivan@ls3ip.com
shea@ls3ip.com
smith@ls3ip.com

Mark D. Siegmund
State Bar No. 24117055
mark@waltfairpllc.com
Law Firm of Walt, Fair PLLC.
1508 North Valley Mills Drive
Waco, Texas 76710
Telephone: (254) 772-6400
Facsimile: (254) 772-6432

ATTORNEYS FOR PLAINTIFF SONOS, INC.

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 1	
<p>[1.0] A first zone player comprising:</p>	<p>Google’s “Cast” technology enables Cast-enabled media players to be included in a “speaker group” “for synchronous music throughout the home.” These Cast-enabled media players include Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality. <i>See, e.g.</i>, https://store.google.com/us/product/google_home_max?hl=en-US; https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US; https://www.google.com/chromecast/built-in/audio/.</p> <p>To facilitate this grouping functionality, the Google Home app allows a user to “[c]reate and manage speaker groups” from the user’s smartphone, tablet, or computer device, as well as to “cast” to a previously-created “speaker group” from the user’s smartphone, tablet, or computer device, which would cause the “speaker group” to be invoked. https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en.</p> <p>In addition, there are many other Cast-enabled Android, iOS, or Chrome apps that allow a user to “cast” to a previously-created “speaker group” using the user’s smartphone, tablet, or computer device, including certain of Google’s own Cast-enabled apps (e.g., YouTube Music app, the Google Play Music app, the Google Podcasts, etc.) as well as certain third-party Cast-enabled apps. The Google Home app, either alone or together with one or more of these other Cast-enabled apps, can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, or Chrome apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer device. <i>See, e.g.</i>, https://store.google.com/us/magazine/compare_pixel; https://store.google.com/us/product/google_pixelbook_specs; https://store.google.com/us/product/pixel_slate_specs. For purposes of this chart, any smartphone, tablet, or computer device installed with at least the Google Home app will be referred to as a “Cast-enabled computing device.”</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

	<p>Certain of the aforementioned Cast-enabled media players also include a display screen and firmware that enables these Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music; https://store.google.com/us/product/google_nest_hub_max?hl=en-US; https://support.google.com/googlenest/answer/9165738?hl=en-GB&ref_topic=7030084. Similar to the Cast-enabled apps installed on the Cast-enabled computing devices, the firmware installed on these Cast-enabled displays allows a user to “cast” to a previously-created “speaker group” using the Cast-enabled display’s user interface.</p> <p>As described in further detail below, each Cast-enabled media player comprises a “zone player” as recited in claim 1, and each Cast-enabled computing device comprises a “network device” as recited in claim 1.</p>
[1.1] a network interface that is configured to communicatively couple the first zone player to at least one data network;	Each Cast-enabled media player comprises a network interface, such as a Wi-Fi interface, that is configured to communicatively couple the Cast-enabled media player to at least one data network, such as a Wi-Fi network. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7072284?hl=en ; https://store.google.com/us/product/google_home_max?hl=en-US .
[1.2] one or more processors;	Each Cast-enabled media player comprises one or more processors. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7072284?hl=en ; https://store.google.com/us/product/google_home_max?hl=en-US .
[1.3] a non-transitory computer-readable medium; and	Each Cast-enabled media player comprises a non-transitory computer-readable medium. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7072284?hl=en ; https://store.google.com/us/product/google_home_max?hl=en-US .
[1.4] program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the first zone player to perform functions comprising:	Each Cast-enabled media player comprises program instructions stored on the non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to perform the functions identified below. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7072284?hl=en ; https://store.google.com/us/product/google_home_max?hl=en-US .

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

<p>[1.5] while operating in a standalone mode in which the first zone player is configured to play back media individually in a networked media playback system comprising the first zone player and at least two other zone players:</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player's non-transitory computer-readable medium that, when executed by the Cast-enabled media player's one or more processors, cause the Cast-enabled media player to, while operating in a standalone mode in which the Cast-enabled media player is configured to play back media individually in a networked Cast-enabled media playback system comprising the Cast-enabled media player and at least two other Cast-enabled media players, perform the functions identified below.</p> <p>For instance, each Cast-enabled media player is programmed such that, while in a networked Cast-enabled media playback system that includes at least two other Cast-enabled media players, the Cast-enabled media player has the capability to operate in a standalone mode in which the Cast-enabled media player is configured to play back audio individually (as opposed to being configured to play back audio in synchrony with one or more other Cast-enabled media players as part of a "speaker group" or a "speaker pair"). <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p>
<p>[1.6] (i) receiving, from a network device over a data network, a first indication that the first zone player has been added to a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked; and</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player's non-transitory computer-readable medium that, when executed by the Cast-enabled media player's one or more processors, cause the Cast-enabled media player to receive, from a Cast-enabled computing device over a data network, a first indication that the Cast-enabled media player has been added to a first zone scene comprising a first predefined grouping of Cast-enabled media players including at least the Cast-enabled media player and a second Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked.</p> <p>For instance, each Cast-enabled media player is programmed such that, while the Cast-enabled media player is in a networked Cast-enabled media playback system that includes at least two other Cast-enabled media players and is operating in a standalone mode in which the Cast-enabled media player is configured to play back audio individually, the Cast-enabled media player has the capability to receive, from a Cast-enabled computing device over a Wi-Fi network, a first</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

	<p>indication that the Cast-enabled media player has been added to a first predefined “speaker group” that includes the Cast-enabled media player and a second Cast-enabled media player in the networked Cast-enabled media playback system, which amounts to a “first zone scene” comprising a “first predefined grouping” of Cast-enabled media players that are “to be configured for synchronous playback of media” when the first predefined “speaker group” is invoked. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (explaining that when Cast-enabled media players are grouped together into a “speaker group” those Cast-enabled media players are configured for “synchronous music throughout the home”).</p> <p>As one possibility, a Cast-enabled media player will receive such an indication from a Cast-enabled computing device as a result of a user inputting a request to create a new predefined “speaker group” via the Cast-enabled computing device’s user interface. Illustrative examples of such user input are shown in Ex. D, claim limitations 1.5, 1.7.</p>
<p>[1.7] (ii) receiving, from the network device over the data network, a second indication that the first zone player has been added to a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the second zone player is different than the third zone player;</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to receive, from a Cast-enabled computing device over a data network, a second indication that the Cast-enabled media player has been added to a second zone scene comprising a second predefined grouping of Cast-enabled media players including at least the Cast-enabled media player and a third Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked, where the second Cast-enabled media player is different than the third Cast-enabled media player.</p> <p>For instance, each Cast-enabled media player is programmed such that, while the Cast-enabled media player is in a networked Cast-enabled media playback system that includes at least two other Cast-enabled media players and is operating in a standalone mode in which the Cast-enabled media player is configured to play back audio individually, the Cast-enabled media player has the capability to receive, from a Cast-enabled computing device over a Wi-Fi network, a second indication that the Cast-enabled media player has been added to a second predefined “speaker group” that includes the Cast-enabled media player and a third Cast-enabled media player in the networked Cast-enabled media playback system, which amounts to a “second zone scene” comprising a “second predefined grouping” of Cast-enabled media players that are “to be configured for synchronous playback of media” when the second predefined “speaker group” is</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

	<p>invoked. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (explaining that when Cast-enabled media players are grouped together into a “speaker group” those Cast-enabled media players are configured for “synchronous music throughout the home”).</p> <p>As one possibility, a Cast-enabled media player will receive such an indication from a Cast-enabled computing device as a result of a user inputting a request to create a new predefined “speaker group” via the Cast-enabled computing device’s user interface. Illustrative examples of such user input are shown in Ex. D, claim limitations 1.5, 1.7.</p>
<p>[1.8] after receiving the first and second indications, continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation;</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to, after receiving the first and second indications, continue to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation.</p> <p>For instance, each Cast-enabled media player is programmed such that, after receiving the first and second indications while the Cast-enabled media player is in a networked Cast-enabled media playback system that includes at least two other Cast-enabled media players and is operating in a standalone mode in which the Cast-enabled media player is configured to play back audio individually, the Cast-enabled media player continues to operate in the standalone mode until one of the first predefined “speaker group” or the second predefined “speaker group” has been selected for invocation. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p>
<p>[1.9] after the given one of the first and second zone scenes has been selected for invocation, receiving, from the network device over the data network, an instruction to</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to, after the given one of the first and second zone scenes has been selected for invocation, receive, from the Cast-enabled computing device over the data network, an instruction to operate in accordance with a given one</p>

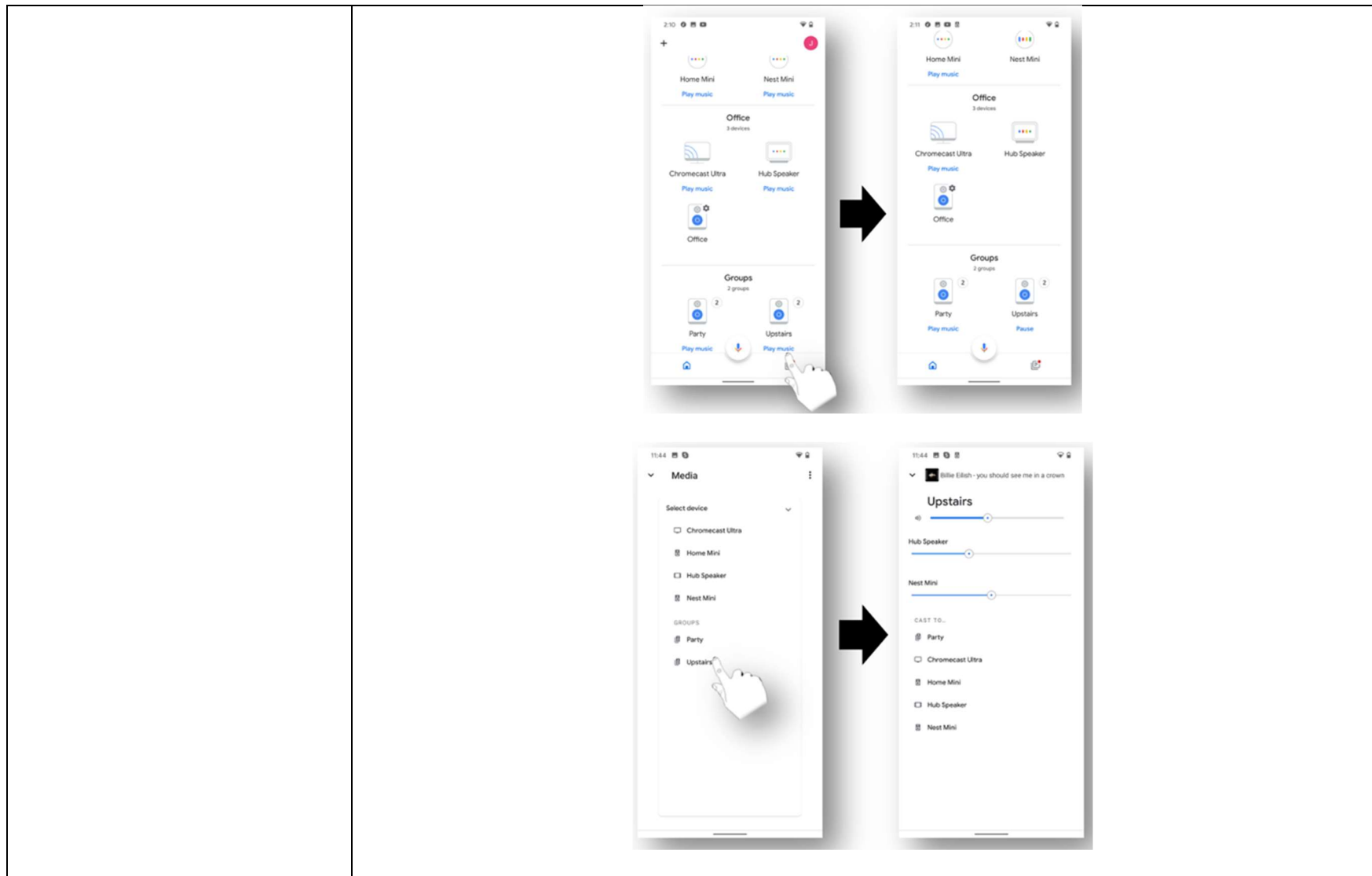
Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

<p>operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of zone players; and</p>	<p>of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of Cast-enabled media players.</p> <p>For instance, each Cast-enabled media player is programmed such that, after one of the first and second predefined “speaker groups” has been selected for invocation using a Cast-enabled computing device, the Cast-enabled media player has the capability to receive, from the Cast-enabled computing device over the Wi-Fi network, an instruction to operate in accordance with the selected “speaker group,” which amounts to “a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings” of Cast-enabled media players. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>A Cast-enabled media player typically receives such an instruction from a Cast-enabled computing device as a result of a user inputting a request to invoke a predefined “speaker group” via the Cast-enabled computing device’s user interface. Illustrative examples of such user input are shown in Ex. D, claim limitations 1.10.</p>
<p>[1.10] based on the instruction, transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players such that the first zone player is configured to coordinate with at least one other zone player in the given one of the first and second predefined groupings of zone players over a data network in</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to, based on the instruction, transition from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least one other Cast-enabled media player in the given one of the first and second predefined groupings of Cast-enabled media players over a data network in order to output media in synchrony with output of media by the at least one other Cast-enabled media player in the given one of the first and second predefined groupings of Cast-enabled media players.</p> <p>For instance, each Cast-enabled media player is programmed such that, based on a received instruction to operate in accordance with a selected “speaker group,” the Cast-enabled media</p>

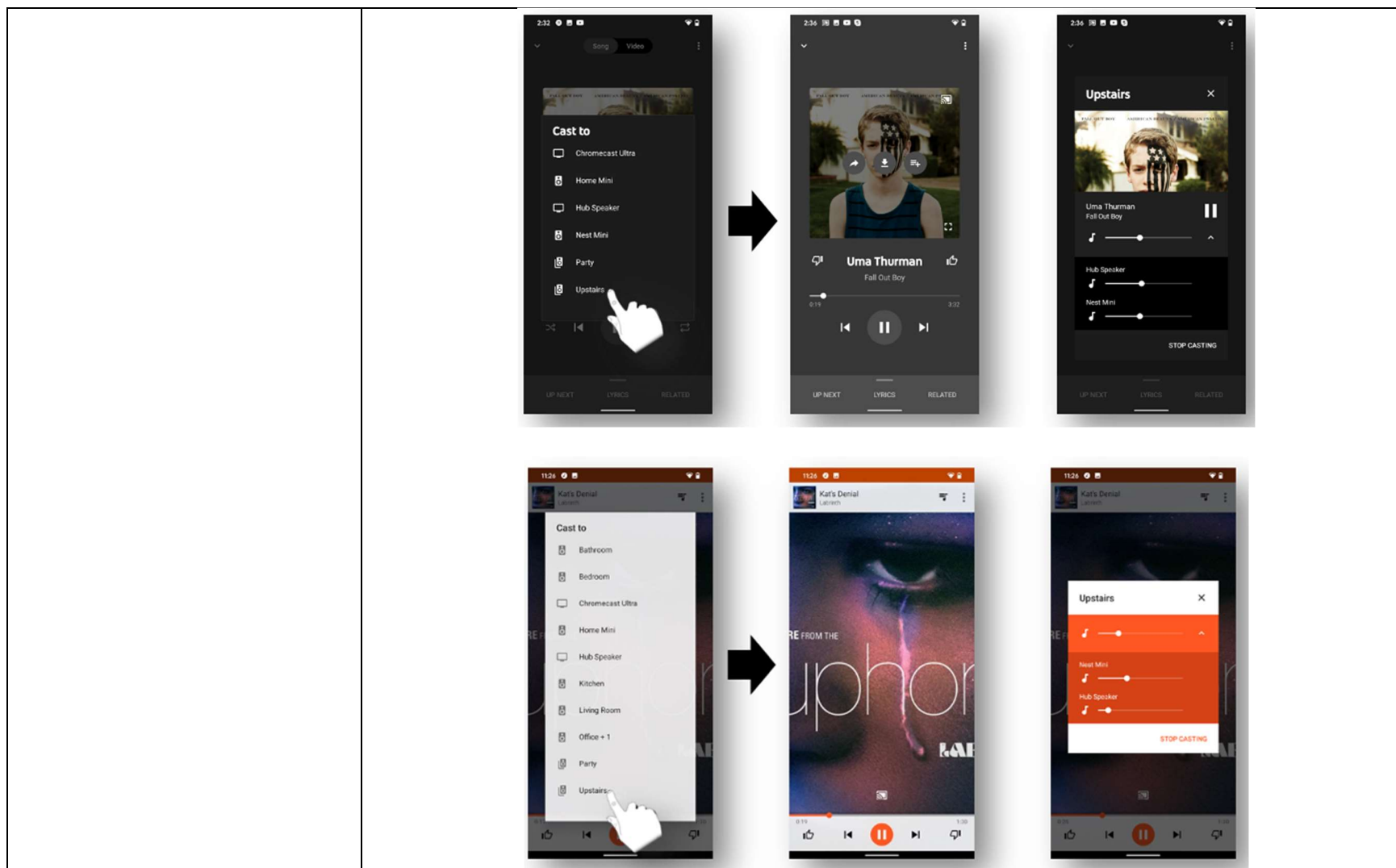
Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

<p>order to output media in synchrony with output of media by the at least one other zone player in the given one of the first and second predefined groupings of zone players.</p>	<p>player transitions from operating in the standalone mode to operating in accordance with the selected “speaker group” (which as noted above amounts to “a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of zone players”) such that the Cast-enabled media player is configured to coordinate with at least one other Cast-enabled media player in the selected “speaker group” over a Wi-Fi network in order to output audio in synchrony with output of audio by the at least one other Cast-enabled media player in the selected “speaker group.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”).</p> <p>Examples of this functionality are illustrated by the following screenshots from a Cast-enabled computing device installed with the Google Home app as well as other Cast-enabled apps such as Google Play Music and YouTube Music, which show the predefined “speaker group” named “Upstairs” being invoked such that the “Nest Mini” and “Hub Speaker” players each transition from operating in the standalone mode in which the player was configured to play back audio individually to operating in accordance with the predefined “speaker group” named “Upstairs” such that the “Nest Mini” and “Hub Speaker” players are configured to coordinate with one another to output audio in synchrony:</p>
---	---

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885



Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885



Claim 2	
[2.0] The first zone player of claim 1, wherein the instruction	As described above, each Cast-enabled media player comprises a “zone player,” as recited in claim 1. Moreover, each Cast-enabled media player is programmed such that the instruction to operate in

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 2	
<p>to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the first zone scene, and</p>	<p>accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the first zone scene.</p> <p>For instance, each Cast-enabled media player is programmed such that, after a first predefined “speaker group” has been selected for invocation using a Cast-enabled computing device, the Cast-enabled media player has the capability to receive, from the Cast-enabled computing device over a Wi-Fi network, an instruction to operate in accordance with the first predefined “speaker group.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>As one possibility, a Cast-enabled media player will receive such an instruction to operate in accordance with a first predefined “speaker group” from a Cast-enabled computing device as a result of a user inputting a request to invoke the first predefined “speaker group” via the Cast-enabled computing device’s user interface. Illustrative examples of such user input are shown in Ex. D, claim limitation 1.10.</p>
<p>[2.1] wherein transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players comprises transitioning from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to</p>	<p>Each Cast-enabled media player is programmed such that transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players comprises transitioning from operating in the standalone mode to operating in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player.</p> <p>For instance, each Cast-enabled media player is programmed such that, based on a received instruction to operate in accordance with a first predefined “speaker group” that includes the Cast-enabled media player and a second Cast-enabled media player in a networked Cast-enabled media playback system, the Cast-enabled media player transitions from operating in the standalone mode to operating in accordance with the first predefined “speaker group” such that the Cast-enabled</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 2	
coordinate with at least the second zone player to play back output media in synchrony with output of media by at least the second zone player.	media player is configured to coordinate with at least the second Cast-enabled media player over a Wi-Fi network in order to output audio in synchrony with output of audio by at least the second Cast-enabled media player in the selected first predefined “speaker group.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”). Examples of this functionality are illustrated in claim limitation 1.10 above.
Claim 3	
[3.0] The first zone player of claim 2, wherein the instruction is a first instruction, and wherein the first zone player further comprises program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the first zone player to perform functions comprising:	As described above, each Cast-enabled media player comprises a “zone player,” as recited in claim 2. Moreover, each Cast-enabled media player is programmed such that the instruction to operate in accordance with the first zone scene is a first instruction, and each Cast-enabled media player further comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to perform the functions identified below.
[3.1] while operating in accordance with the first predefined grouping of zone players, receiving, from the network device over the data network, a second instruction to operate in accordance with the second predefined grouping of zone players; and	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to, while operating in accordance with the first predefined grouping of Cast-enabled media players, receive, from the Cast-enabled computing device over the data network, a second instruction to operate in accordance with the second predefined grouping of Cast-enabled media players.</p> <p>For instance, each Cast-enabled media player is programmed such that, while operating in accordance with the first predefined “speaker group” that includes the Cast-enabled media player and a second Cast-enabled media player in a networked Cast-enabled media playback system, the Cast-enabled media player has the capability to receive, from a Cast-enabled computing device over</p>

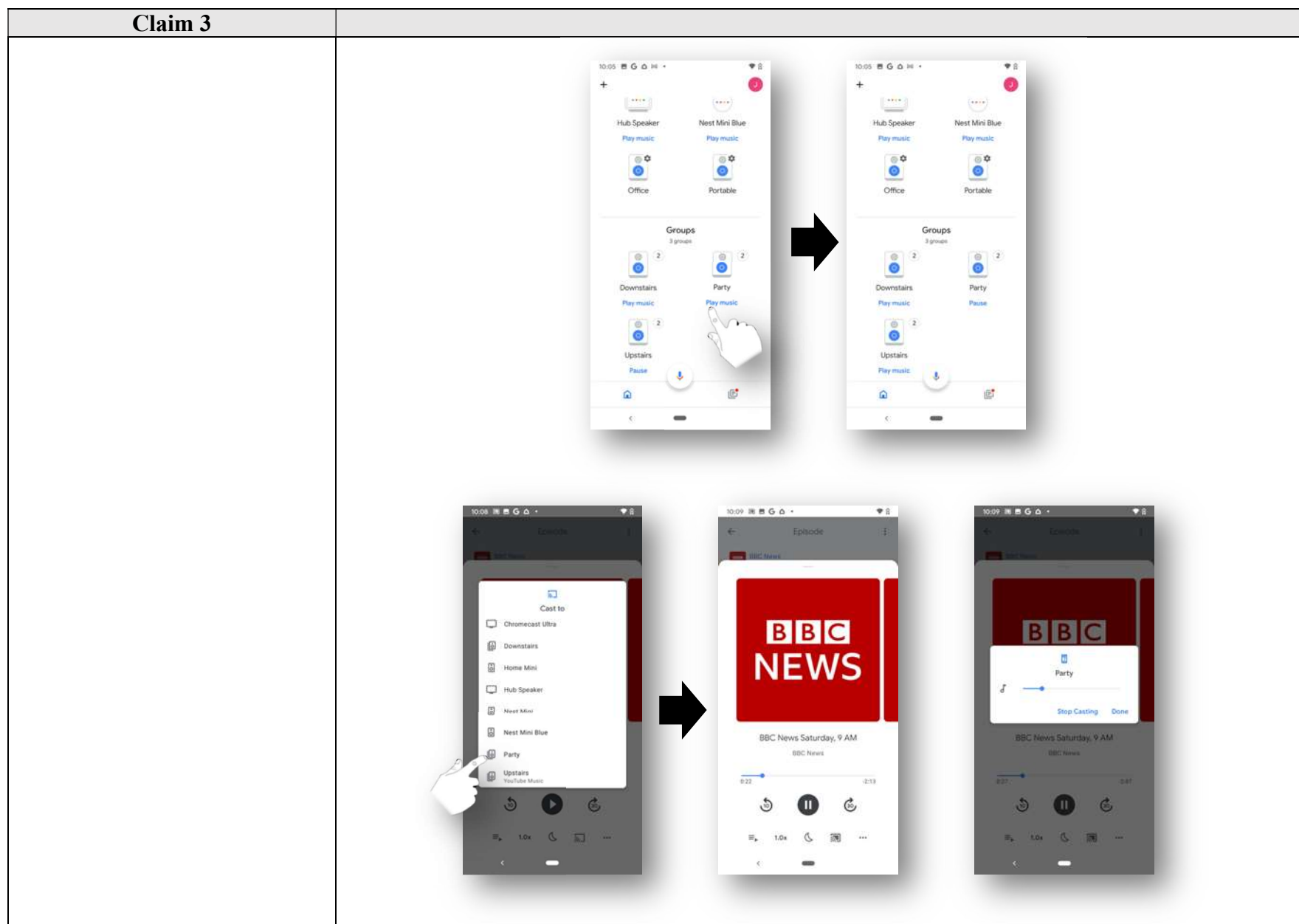
Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 3	
	<p>a Wi-Fi network, a second instruction to operate in accordance with the second predefined “speaker group” that includes the Cast-enabled media player and a third Cast-enabled media player in the networked Cast-enabled media playback system. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>As one possibility, a Cast-enabled media player will receive such an instruction to operate in accordance with a second predefined “speaker group” from a Cast-enabled computing device as a result of a user inputting a request to invoke the second predefined “speaker group” via the Cast-enabled computing device’s user interface. Illustrative examples of such user input are shown in Ex. D, claim limitation 2.1.</p>
<p>[3.2] based on the second instruction, (a) ceasing to operate in accordance with the first predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player and (b) beginning to operate in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to, based on the second instruction, (a) cease to operate in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player and (b) begin to operate in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player.</p> <p>For instance, each Cast-enabled media player is programmed such that, based on the second instruction to operate in accordance with the second predefined “speaker group” that is received while the Cast-enabled media player is operating in accordance with the first predefined “speaker group,” the Cast-enabled media player (a) ceases to operate in accordance with the first predefined “speaker group” such that the Cast-enabled media player is no longer configured to coordinate with the second Cast-enabled media player to output audio in synchrony with output of audio by the second Cast-enabled media player and (b) begins to operate in accordance with the second</p>

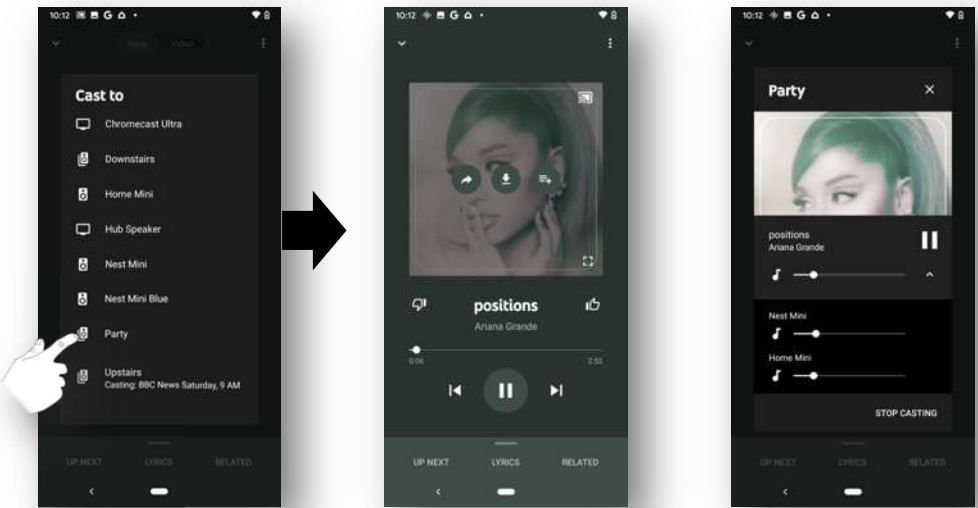
Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 3	
<p>synchrony with output of media by at least the third zone player.</p>	<p>predefined “speaker group” such that the Cast-enabled media player is configured to coordinate with the third Cast-enabled media player to output audio in synchrony with output of audio by the third Cast-enabled media player. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”).</p> <p>Examples of this functionality are illustrated by the following screenshots from a Cast-enabled computing device installed with the Google Home app as well as other Cast-enabled apps such as Google Podcasts and YouTube Music, which show the predefined “speaker group” named “Party” (<i>e.g.</i>, the second zone scene) being invoked while the first Cast-enabled media player named “Nest Mini” is operating in accordance with the predefined “speaker group” named “Upstairs,” such that the first Cast-enabled media player named “Nest Mini” and the third Cast-enabled media player named “Home Mini” become configured to coordinate with one another to output audio in synchrony:</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885



Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 3	
	 <p>Various other Cast-enabled apps provide similar functionality.</p>

Claim 5	
<p>[5.0] The first zone player of claim 1, wherein the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the second zone scene, and</p>	<p>As described above, each Cast-enabled media player comprises a “zone player,” as recited in claim 1. Moreover, each Cast-enabled media player is programmed such that the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the second zone scene.</p> <p>For instance, each Cast-enabled media player is programmed such that, after a second predefined “speaker group” has been selected for invocation using a Cast-enabled computing device, the Cast-enabled media player has the capability to receive, from the Cast-enabled computing device over a Wi-Fi network, an instruction to operate in accordance with the second predefined “speaker group.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 5	
	<p data-bbox="646 233 1835 342">GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p data-bbox="646 380 1892 553">As one possibility, a Cast-enabled media player will receive such an instruction to operate in accordance with a second predefined “speaker group” from a Cast-enabled computing device as a result of a user inputting a request to invoke the second predefined “speaker group” via the Cast-enabled computing device’s user interface. Illustrative examples of such user input are shown in Ex. D, claim limitations 1.10, 2.1.</p>
<p data-bbox="205 563 617 1182">wherein transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players comprises transitioning from operating in the standalone mode to operating in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.</p>	<p data-bbox="646 563 1898 813">Each Cast-enabled media player is programmed such that transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players comprises transitioning from operating in the standalone mode to operating in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player.</p> <p data-bbox="646 850 1913 1289">For instance, each Cast-enabled media player is programmed such that, based on a received instruction to operate in accordance with a second predefined “speaker group” that includes the Cast-enabled media player and a third Cast-enabled media player in a networked Cast-enabled media playback system, the Cast-enabled media player transitions from operating in the standalone mode to operating in accordance with the second predefined “speaker group” such that the Cast-enabled media player is configured to coordinate with the third Cast-enabled media player over a Wi-Fi network in order to output audio in synchrony with output of audio by at least the third Cast-enabled media player in the selected second predefined “speaker group.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”). Examples of this functionality are illustrated in claim limitation 1.10 above.</p>

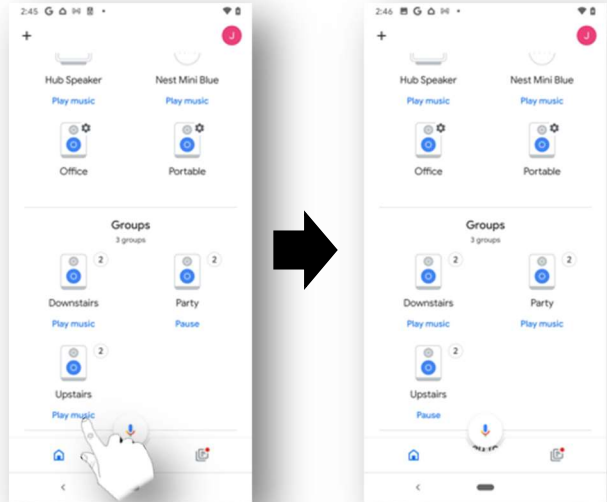
Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 6	
<p>[6.0] The first zone player of claim 5, wherein the instruction is a first instruction, and wherein the first zone player further comprises program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the first zone player to perform functions comprising:</p>	<p>As described above, each Cast-enabled media player comprises a “zone player,” as recited in claim 5. Moreover, each Cast-enabled media player is programmed such that the instruction to operate in accordance with the second zone scene is a first instruction, and each Cast-enabled media player further comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to perform the functions identified below.</p>
<p>[6.1] while operating in accordance with the second predefined grouping of zone players, receiving, from the network device over the data network, a second instruction to operate in accordance with the first predefined grouping of zone players; and</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to, while operating in accordance with the second predefined grouping of Cast-enabled media players, receive, from the Cast-enabled computing device over the data network, a second instruction to operate in accordance with the first predefined grouping of Cast-enabled media players.</p> <p>For instance, each Cast-enabled media player is programmed such that, while operating in accordance with the second predefined “speaker group” that includes the Cast-enabled media player and a third Cast-enabled media player in a networked Cast-enabled media playback system, the Cast-enabled media player has the capability to receive, from a Cast-enabled computing device over a Wi-Fi network, a second instruction to operate in accordance with the first predefined “speaker group” that includes the Cast-enabled media player and a second Cast-enabled media player in the networked Cast-enabled media playback system. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p>

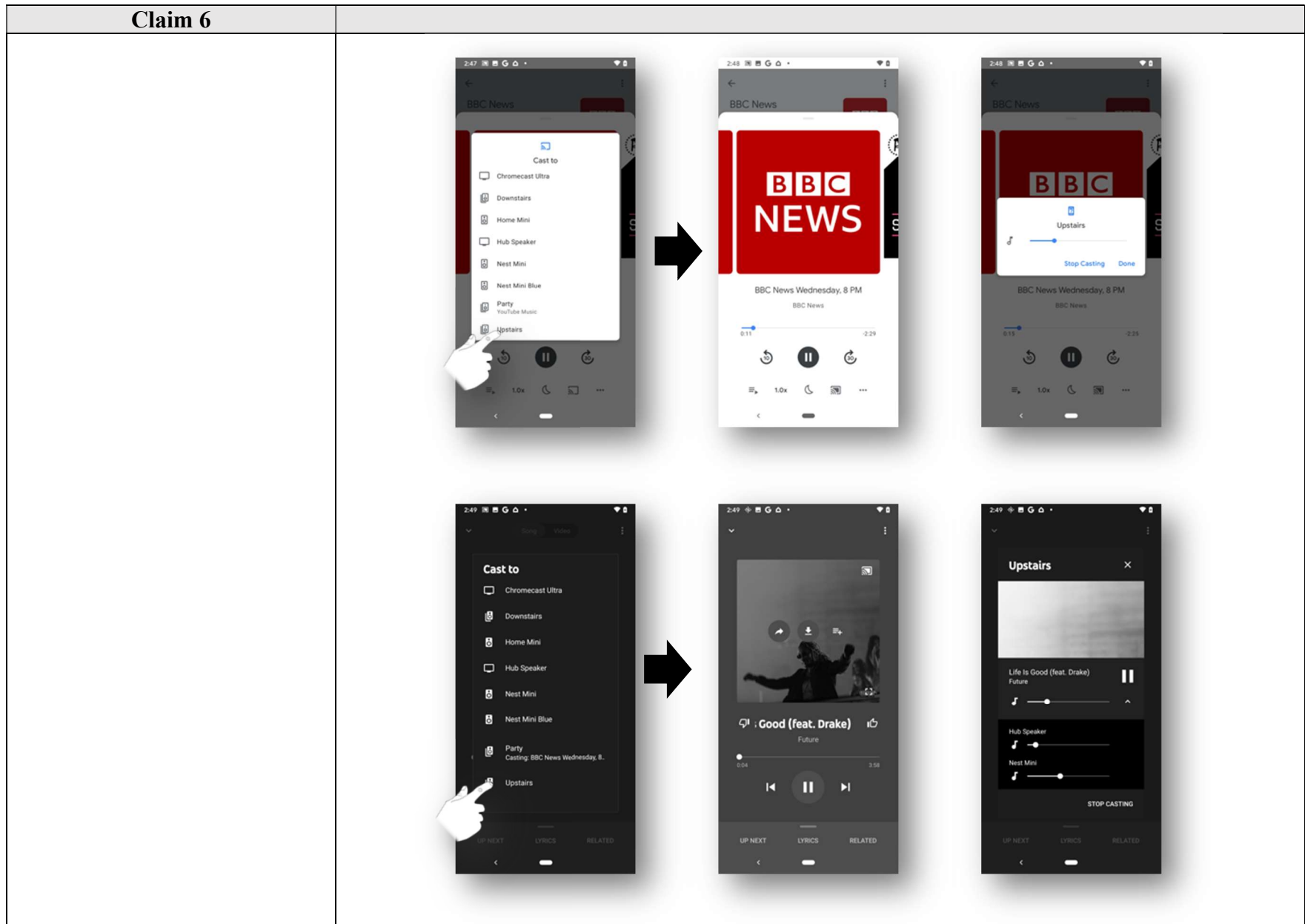
Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 6	
	<p>As one possibility, a Cast-enabled media player will receive such an instruction to operate in accordance with a second predefined “speaker group” from a Cast-enabled computing device as a result of a user inputting a request to invoke the second predefined “speaker group” via the Cast-enabled computing device’s user interface. Illustrative examples of such user input are shown in Ex. D, claim limitation 2.1.</p>
<p>[6.2] based on the second instruction, (a) ceasing to operate in accordance with the second predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player and (b) beginning to operate in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</p>	<p>Each Cast-enabled media player comprises program instructions stored on the Cast-enabled media player’s non-transitory computer-readable medium that, when executed by the Cast-enabled media player’s one or more processors, cause the Cast-enabled media player to, based on the second instruction, (a) cease to operate in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is no longer configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player and (b) begin to operate in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player.</p> <p>For instance, each Cast-enabled media player is programmed such that, based on the second instruction to operate in accordance with the first predefined “speaker group” that is received while the Cast-enabled media player is operating in accordance with the second predefined “speaker group,” the Cast-enabled media player (a) ceases to operate in accordance with the second predefined “speaker group” such that the Cast-enabled media player is no longer configured to coordinate with the third Cast-enabled media player to output audio in synchrony with output of audio by the third Cast-enabled media player and (b) begins to operate in accordance with the first predefined “speaker group” such that the Cast-enabled media player is configured to coordinate with the second Cast-enabled media player to output audio in synchrony with output of audio by the second Cast-enabled media player. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”).</p> <p>Examples of this functionality are illustrated by the following screenshots from a Cast-enabled computing device installed with the Google Home app as well as other Cast-enabled apps such as</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 6	
	<p>Google Podcasts and YouTube Music, which show the predefined “speaker group” named “Upstairs” (e.g., the first zone scene) being invoked while the first Cast-enabled media player named “Nest Mini” is operating in accordance with the predefined “speaker group” named “Party,” such that the first Cast-enabled media player named “Nest Mini” and the second Cast-enabled media player named “Hub Speaker” become configured to coordinate with one another to output audio in synchrony:</p> 

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885



Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 6	
	Various other Cast-enabled apps provide similar functionality.
Claim 7	
[7.0] The first zone player of claim 1, wherein the first predefined grouping of zone players does not include the third zone player, and wherein the second predefined grouping of zone players does not include the second zone player.	<p>As described above, each Cast-enabled media player comprises a “zone player,” as recited in claim 1. Moreover, each Cast-enabled media player is programmed such that the first predefined grouping of Cast-enabled media players does not include the third Cast-enabled media player, and wherein the second predefined grouping of Cast-enabled media players does not include the second Cast-enabled media player.</p> <p>For instance, each Cast-enabled media player is programmed such that the first predefined “speaker group” includes the Cast-enabled media player and the second Cast-enabled media player in the networked Cast-enabled media playback system but does not include the third Cast-enabled media player, and where the second predefined “speaker group” includes the Cast-enabled media player and the third Cast-enabled media player in the networked Cast-enabled media playback system but does not include the second Cast-enabled media player. <i>Compare</i> claim limitation 6.2 (illustrating a predefined “speaker group” named “Upstairs” that includes a first Cast-enabled media player named “Nest Mini” and a second Cast-enabled media player named “Hub Speaker” but does not include a third Cast-enabled media player named “Home Mini”) <i>with</i> claim limitation 3.2 (illustrating a predefined “speaker group” named “Party” that includes the first Cast-enabled media player named “Nest Mini” and the third Cast-enabled media player named “Home Mini” but does not include the second Cast-enabled media player named “Hub Speaker”); <i>see also, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en.</p>
Claim 8	
[8.0] A non-transitory computer-readable medium, wherein the non-transitory computer-readable medium is provisioned with program instructions that, when executed by one or more processors,	<p>Google’s “Cast” technology enables Cast-enabled media players to be included in a “speaker group” “for synchronous music throughout the home.” These Cast-enabled media players include Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality. <i>See, e.g.,</i> https://store.google.com/us/product/google_home_max?hl=en-US;</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 8	
<p>cause a first zone player to perform functions comprising:</p>	<p>https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US; https://www.google.com/chromecast/built-in/audio/.</p> <p>To facilitate this grouping functionality, the Google Home app allows a user to “[c]reate and manage speaker groups” from the user’s smartphone, tablet, or computer device, as well as to “cast” to a previously-created “speaker group” from the user’s smartphone, tablet, or computer device, which would cause the “speaker group” to be invoked. https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en.</p> <p>In addition, there are many other Cast-enabled Android, iOS, or Chrome apps that allow a user to “cast” to a previously-created “speaker group” using the user’s smartphone, tablet, or computer device, including certain of Google’s own Cast-enabled apps (e.g., YouTube Music app, the Google Play Music app, the Google Podcasts, etc.) as well as certain third-party Cast-enabled apps. The Google Home app, either alone or together with one or more of these other Cast-enabled apps, can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, or Chrome apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer device. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel; https://store.google.com/us/product/google_pixelbook_specs; https://store.google.com/us/product/pixel_slate_specs. For purposes of this chart, any smartphone, tablet, or computer device installed with at least the Google Home app will be referred to as a “Cast-enabled computing device.”</p> <p>Certain of the aforementioned Cast-enabled media players also include a display screen and firmware that enables these Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music; https://store.google.com/us/product/google_nest_hub_max?hl=en-US; https://support.google.com/googlenest/answer/9165738?hl=en-GB&ref_topic=7030084. Similar to the Cast-enabled apps installed on the Cast-enabled computing devices, the firmware installed on</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 8	
	<p>these Cast-enabled displays allows a user to “cast” to a previously-created “speaker group” using the Cast-enabled display’s user interface.</p> <p>As described in further detail below, each Cast-enabled media player is a “zone player” that comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled media player’s processor, cause the Cast-enabled media player to perform the functions recited in claim 8, and each Cast-enabled computing device comprises a “network device” as recited in claim 8.</p>
<p>[8.1] while operating in a standalone mode in which the first zone player is configured to play back media individually in a networked media playback system comprising the first zone player and at least two other zone players:</p>	<p>Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled media player’s processor, cause the Cast-enabled media player to, while operating in a standalone mode in which the Cast-enabled media player is configured to play back media individually in a networked Cast-enabled media playback system comprising the Cast-enabled media player and at least two other Cast-enabled media players, perform the functions identified below. <i>See</i> claim limitation 1.5.</p>
<p>[8.2] (i) receiving, from a network device over a data network, a first indication that the first zone player has been added to a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked; and</p>	<p>Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled media player’s processor, cause the Cast-enabled media player to, receive, from a Cast-enabled computing device over a data network, a first indication that the Cast-enabled media player has been added to a first zone scene comprising a first predefined grouping of Cast-enabled media players including at least the Cast-enabled media player and a second Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked. <i>See</i> claim limitation 1.6.</p>
<p>[8.3] (ii) receiving, from the network device over the data network, a second indication</p>	<p>Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled media player’s processor, cause the Cast-enabled media player to receive, from a Cast-enabled computing device</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 8	
that the first zone player has been added to a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the second zone player is different than the third zone player;	over a data network, a second indication that the Cast-enabled media player has been added to a second zone scene comprising a second predefined grouping of Cast-enabled media players including at least the Cast-enabled media player and a third Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked, where the second Cast-enabled media player is different than the third Cast-enabled media player. <i>See</i> claim limitation 1.7.
[8.4] after receiving the first and second indications, continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation;	Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled media player's processor, cause the Cast-enabled media player to, after receiving the first and second indications, continue to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation. <i>See</i> claim limitation 1.8.
[8.5] after the given one of the first and second zone scenes has been selected for invocation, receiving, from the network device over the data network, an instruction to operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of zone players; and	Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled media player's processor, cause the Cast-enabled media player to, after the given one of the first and second zone scenes has been selected for invocation, receive, from the Cast-enabled computing device over the data network, an instruction to operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of Cast-enabled media players. <i>See</i> claim limitation 1.9.

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 8	
<p>[8.6] based on the instruction, transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players such that the first zone player is configured to coordinate with at least one other zone player in the given one of the first and second predefined groupings of zone players over a data network in order to output media in synchrony with output of media by the at least one other zone player in the given one of the first and second predefined groupings of zone players.</p>	<p>Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled media player's processor, cause the Cast-enabled media player to, based on the instruction, transition from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least one other Cast-enabled media player in the given one of the first and second predefined groupings of Cast-enabled media players over a data network in order to output media in synchrony with output of media by the at least one other Cast-enabled media player in the given one of the first and second predefined groupings of Cast-enabled media players. <i>See</i> claim limitation 1.10.</p>
Claim 9	
<p>[9.0] The non-transitory computer-readable medium of claim 8, wherein the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the first zone scene, and</p>	<p>As described above, each Cast-enabled media player comprises a “non-transitory computer-readable medium,” as recited in claim 8. Moreover, in accordance with the program instructions, each Cast-enabled media player is programmed such that the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the first zone scene. <i>See</i> claim limitation 2.0.</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 9	
<p>[9.1] wherein transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players comprises transitioning from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</p>	<p>In accordance with the program instructions, each Cast-enabled media player is programmed such that transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players comprises transitioning from operating in the standalone mode to operating in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player. See claim limitation 2.1.</p>
Claim 10	
<p>[10.0] The non-transitory computer-readable medium of claim 9, wherein the instruction is a first instruction, and wherein the non-transitory computer-readable medium is also provisioned with program instructions that, when executed by the one or more processors, cause the first zone player to perform functions comprising:</p>	<p>As described above, each Cast-enabled media player comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled media player is programmed such that the instruction to operate in accordance with the first zone scene is a first instruction, and each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled media player, cause the Cast-enabled media player to perform the functions identified below.</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 10	
<p>[10.1] while operating in accordance with the first predefined grouping of zone players, receiving, from the network device over the data network, a second instruction to operate in accordance with the second predefined grouping of zone players; and</p>	<p>Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled media player, cause the Cast-enabled media player to, while operating in accordance with the first predefined grouping of Cast-enabled media players, receive, from the Cast-enabled computing device over the data network, a second instruction to operate in accordance with the second predefined grouping of Cast-enabled media players. <i>See</i> claim limitation 3.1.</p>
<p>[10.2] based on the second instruction, (a) ceasing to operate in accordance with the first predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player and (b) beginning to operate in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.</p>	<p>Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled media player, cause the Cast-enabled media player to, based on the second instruction, (a) cease to operate in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player and (b) begin to operate in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player. <i>See</i> claim limitation 3.2.</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 12	
[12.0] The non-transitory computer-readable medium of claim 8, wherein the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the second zone scene, and	As described above, each Cast-enabled media player comprises a “non-transitory computer-readable medium,” as recited in claim 8. Moreover, in accordance with the program instructions, each Cast-enabled media player is programmed such that the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the second zone scene. <i>See</i> claim limitation 5.0.
[12.1] wherein transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players comprises transitioning from operating in the standalone mode to operating in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.	In accordance with the program instructions, each Cast-enabled media player is programmed such that transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players comprises transitioning from operating in the standalone mode to operating in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player. <i>See</i> claim limitation 5.1.

Claim 13	
[13.0] The non-transitory computer-readable medium of claim 12, wherein the instruction is a first instruction,	As described above, each Cast-enabled media player comprises a “non-transitory computer-readable medium,” as recited in claim 12. Moreover, in accordance with the program instructions, each Cast-enabled media player is programmed such that the instruction to operate in accordance with the second zone scene is a first instruction, and each Cast-enabled media player comprises a

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 13	
and wherein the non-transitory computer-readable medium is also provisioned with program instructions that, when executed by the one or more processors, cause the first zone player to perform functions comprising:	non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled media player, cause the Cast-enabled media player to perform the functions identified below. <i>See</i> claim limitation 6.0.
while operating in accordance with the second predefined grouping of zone players, receiving, from the network device over the data network, a second instruction to operate in accordance with the first predefined grouping of zone players; and	Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled media player, cause the Cast-enabled media player to, while operating in accordance with the second predefined grouping of Cast-enabled media players, receive, from the Cast-enabled computing device over the data network, a second instruction to operate in accordance with the first predefined grouping of Cast-enabled media players. <i>See</i> claim limitation 6.1.
based on the second instruction, (a) ceasing to operate in accordance with the second predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player and (b) beginning to operate in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the	Each Cast-enabled media player comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled media player, cause the Cast-enabled media player to, based on the second instruction, (a) cease to operate in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is no longer configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player and (b) begin to operate in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player. <i>See</i> claim limitation 6.2.

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 13	
second zone player to output media in synchrony with output of media by at least the second zone player.	
Claim 14	
[14.0] The non-transitory computer-readable medium of claim 8, wherein the first predefined grouping of zone players does not include the third zone player, and wherein the second predefined grouping of zone players does not include the second zone player.	As described above, each Cast-enabled media player comprises a “non-transitory computer-readable medium,” as recited in claim 12. Moreover, in accordance with the program instructions, each Cast-enabled media player is programmed such that the first predefined grouping of Cast-enabled media players does not include the third Cast-enabled media player, and wherein the second predefined grouping of Cast-enabled media players does not include the second Cast-enabled media player. <i>See</i> claim limitation 7.0.
Claim 15	
[15.0] A method executed by a first zone player, the method comprising:	<p>Google’s “Cast” technology enables Cast-enabled media players to be included in a “speaker group” “for synchronous music throughout the home.” These Cast-enabled media players include Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality. <i>See, e.g.,</i> https://store.google.com/us/product/google_home_max?hl=en-US; https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US; https://www.google.com/chromecast/built-in/audio/.</p> <p>To facilitate this grouping functionality, the Google Home app allows a user to “[c]reate and manage speaker groups” from the user’s smartphone, tablet, or computer device, as well as to “cast” to a previously-created “speaker group” from the user’s smartphone, tablet, or computer</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 15	
	<p>device, which would cause the “speaker group” to be invoked. https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en. In addition, there are many other Cast-enabled Android, iOS, or Chrome apps that allow a user to “cast” to a previously-created “speaker group” using the user’s smartphone, tablet, or computer device, including certain of Google’s own Cast-enabled apps (e.g., YouTube Music app, the Google Play Music app, the Google Podcasts, etc.) as well as certain third-party Cast-enabled apps. The Google Home app, either alone or together with one or more of these other Cast-enabled apps, can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, or Chrome apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer device. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel; https://store.google.com/us/product/google_pixelbook_specs; https://store.google.com/us/product/pixel_slate_specs. For purposes of this chart, any smartphone, tablet, or computer device installed with at least the Google Home app will be referred to as a “Cast-enabled computing device.”</p> <p>Certain of the aforementioned Cast-enabled media players also include a display screen and firmware that enables these Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music; https://store.google.com/us/product/google_nest_hub_max?hl=en-US; https://support.google.com/googlenest/answer/9165738?hl=en-GB&ref_topic=7030084. Similar to the Cast-enabled apps installed on the Cast-enabled computing devices, the firmware installed on these Cast-enabled displays allows a user to “cast” to a previously-created “speaker group” using the Cast-enabled display’s user interface.</p> <p>As described in further detail below, each Cast-enabled media player comprises a “zone player” that practices the method of claim 15, and each Cast-enabled computing device comprises a “network device” as recited in claim 15.</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 15	
[15.1] while operating in a standalone mode in which the first zone player is configured to play back media individually in a networked media playback system comprising the first zone player and at least two other zone players:	Each Cast-enabled media player practices the steps identified below while operating in a standalone mode in which the Cast-enabled media player is configured to play back media individually in a networked Cast-enabled media playback system comprising the Cast-enabled media player and at least two other Cast-enabled media players. <i>See</i> claim limitation 1.5.
[15.2] (i) receiving, from a network device over a data network, a first indication that the first zone player has been added to a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked; and	Each Cast-enabled media player practices the step of receiving, from a Cast-enabled computing device over a data network, a first indication that the Cast-enabled media player has been added to a first zone scene comprising a first predefined grouping of Cast-enabled media players including at least the Cast-enabled media player and a second Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked. <i>See</i> claim limitation 1.6.
[15.3] (ii) receiving, from the network device over the data network, a second indication that the first zone player has been added to a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous	Each Cast-enabled media player practices the step of receiving, from a Cast-enabled computing device over a data network, a second indication that the Cast-enabled media player has been added to a second zone scene comprising a second predefined grouping of Cast-enabled media players including at least the Cast-enabled media player and a third Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked, where the second Cast-enabled media player is different than the third Cast-enabled media player. <i>See</i> claim limitation 1.7.

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 15	
<p>playback of media when the second zone scene is invoked, wherein the second zone player is different than the third zone player;</p>	
<p>[15.4] after receiving the first and second indications, continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation;</p>	<p>Each Cast-enabled media player practices the step of, after receiving the first and second indications, continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation. <i>See</i> claim limitation 1.8.</p>
<p>[15.5] after the given one of the first and second zone scenes has been selected for invocation, receiving, from the network device over the data network, an instruction to operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of zone players; and</p>	<p>Each Cast-enabled media player practices the step of, after the given one of the first and second zone scenes has been selected for invocation, receiving, from the Cast-enabled computing device over the data network, an instruction to operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of Cast-enabled media players. <i>See</i> claim limitation 1.9.</p>
<p>[15.6] based on the instruction, transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players such that the first zone player is configured to</p>	<p>Each Cast-enabled media player practices the step of, based on the instruction, transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least one other Cast-enabled media player in the given one of the first and second predefined groupings of Cast-enabled media players over a data network in order to output media in synchrony with output of media by the at least one other Cast-enabled media player in the given one of the first and second predefined groupings of Cast-enabled media players. <i>See</i> claim limitation 1.10.</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 15	
<p>coordinate with at least one other zone player in the given one of the first and second predefined groupings of zone players over a data network in order to output media in synchrony with output of media by the at least one other zone player in the given one of the first and second predefined groupings of zone players.</p>	
Claim 16	
<p>[16.0] The method of claim 15, wherein the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the first zone scene, and</p>	<p>As described above, each Cast-enabled media player practices the method of claim 15. Moreover, each Cast-enabled media player practices the aforementioned steps where the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the first zone scene. <i>See</i> claim limitation 2.0.</p>
<p>[16.1] wherein transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players comprises transitioning from operating in the standalone mode to operating in accordance with the first predefined grouping of zone</p>	<p>Each Cast-enabled media player practices the aforementioned steps where transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players comprises transitioning from operating in the standalone mode to operating in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player. <i>See</i> claim limitation 2.1.</p>

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 16	
players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.	
Claim 17	
[17.0] The method of claim 16, wherein the instruction is a first instruction, the method further comprising:	As described above, each Cast-enabled media player practices the method of claim 16. Moreover, each Cast-enabled media player practices the aforementioned steps where the instruction to operate in accordance with the first zone scene is a first instruction, and each Cast-enabled media player practices the steps identified below. <i>See</i> claim limitation 3.0.
[17.1] while operating in accordance with the first predefined grouping of zone players, receiving, from the network device over the data network, a second instruction to operate in accordance with the second predefined grouping of zone players; and	Each Cast-enabled media player practices the step of, while operating in accordance with the first predefined grouping of Cast-enabled media players, receiving, from the Cast-enabled computing device over the data network, a second instruction to operate in accordance with the second predefined grouping of Cast-enabled media players. <i>See</i> claim limitation 3.1.
[17.2] based on the second instruction, (a) ceasing to operate in accordance with the first predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the	Each Cast-enabled media player practices the step of, based on the second instruction, (a) ceasing to operate in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player and (b) beginning to operate in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player. <i>See</i> claim limitation 3.2.

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 17	
second zone player and (b) beginning to operate in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.	
Claim 19	
[19.0] The method of claim 15, wherein the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the second zone scene, and	As described above, each Cast-enabled media player practices the method of claim 15. Moreover, each Cast-enabled media player practices the aforementioned steps where the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the second zone scene. <i>See</i> claim limitation 5.0.
[19.1] wherein transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players comprises transitioning from operating in the standalone mode to operating in accordance with the second predefined grouping of zone players such that the first zone	Each Cast-enabled media player practices the aforementioned steps where transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of Cast-enabled media players comprises transitioning from operating in the standalone mode to operating in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player. <i>See</i> claim limitation 5.1.

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 19	
player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.	
Claim 20	
[20.0] The method of claim 19, wherein the instruction is a first instruction, the method further comprising:	As described above, each Cast-enabled media player practices the method of claim 19. Moreover, each Cast-enabled media player practices the aforementioned steps where the instruction to operate in accordance with the second zone scene is a first instruction, and each Cast-enabled media player practices the steps identified below. <i>See</i> claim limitation 6.0.
[20.1] while operating in accordance with the second predefined grouping of zone players, receiving, from the network device over the data network, a second instruction to operate in accordance with the first predefined grouping of zone players; and	Each Cast-enabled media player practices the step of, while operating in accordance with the second predefined grouping of Cast-enabled media players, receiving, from the Cast-enabled computing device over the data network, a second instruction to operate in accordance with the first predefined grouping of Cast-enabled media players. <i>See</i> claim limitation 6.1.
[20.2] based on the second instruction, (a) ceasing to operate in accordance with the second predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player and (b) beginning to operate in	Each Cast-enabled media player practices the step of, based on the second instruction, (a) ceasing to operate in accordance with the second predefined grouping of Cast-enabled media players such that the Cast-enabled media player is no longer configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player and (b) beginning to operate in accordance with the first predefined grouping of Cast-enabled media players such that the Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player. <i>See</i> claim limitation 6.2.

Ex. A – Initial Infringement Contention Chart: U.S. Patent No. 10,848,885

Claim 20	
<p>accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</p>	